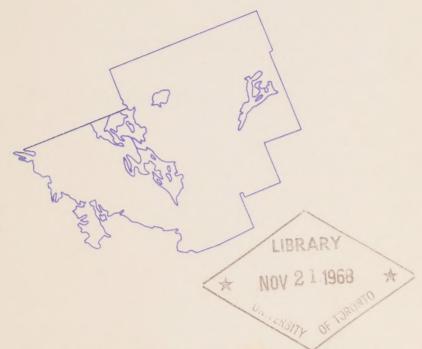


# MUSKOKA DISTRICT LOCAL GOVERNMENT REVIEW



PRELIMINARY RECOMMENDATIONS



MUSKOKA DISTRICT

LOCAL GOVERNMENT REVIEW

PRELIMINARY

RECOMMENDATIONS

OCTOBER 1968

DONALD M. PATERSON Commissioner and Research Director



# TABLE OF CONTENTS

		Page
Terms of Refer	ence	
Introduction .		1
Chantar 1	Structure	4
Chapter 1	D' lui d Come mana amb	4
	T Time Maniaire lities	5
	Number of Municipalities	5
	Method of Election	7
	D: 1 : 1 C : 1 E	9
	District Council Executive	10
	Boards and Commissions	10
Chambar 2	Dennegantation	15
Chapter 2	Representation	15
	Term of Office	15
	Extended Franchise	16
	Dates of Nominations and Elections	16
	Voting by Seasonal Residents	16
	Remuneration of Councillors	18
Chantan 2	Boundaries	19
Chapter 3	Size of a Viable District Unit	19
	Outer Boundaries	20
	T D 1 .	24
	Representation with Two Tiers	30
	D	31
	Representation with Three Tiers	31
Chapter 4	Functions	34
	Division of Functions	35
	Fire Protection	37
	Libraries	37
	Planning	38
	Roads	38
	Economic Development	39
	Clerk-Treasurer Functions	39
	Purchasing	40
	Sewage Disposal, Water Supply	
	and Electricity Supply	40
	General Welfare Assistance	41
	Ambulance Service	42
	Conservation	43

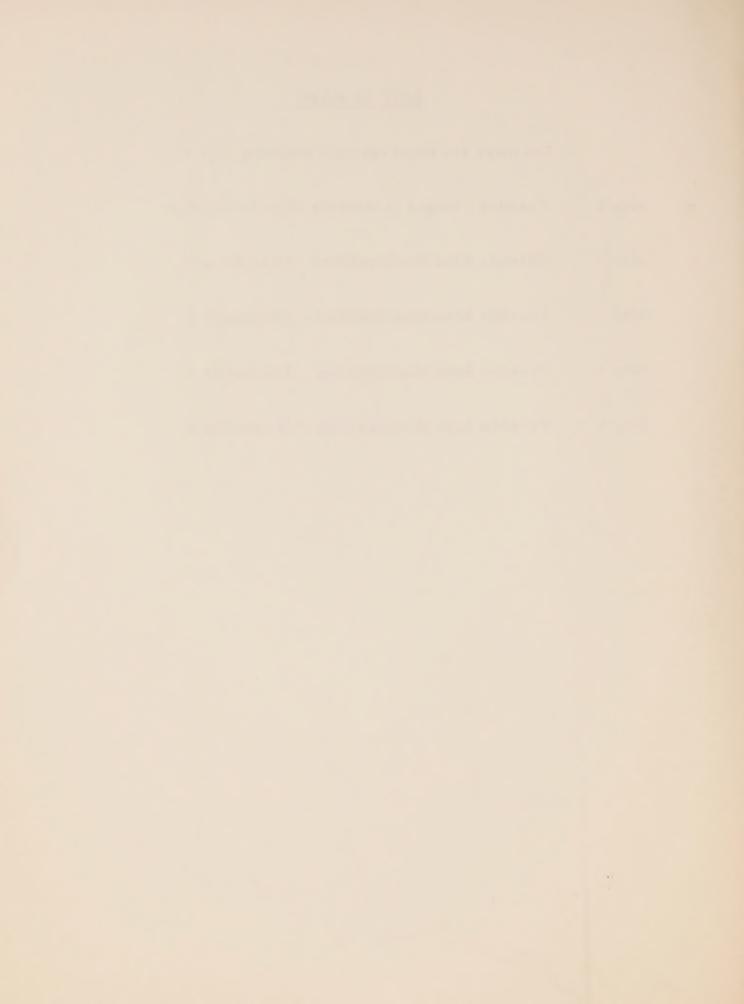
Table of Contents - 2			
Chapter 5.	-	Conclusion	45
Chapter 6.	-	Summary of Preliminary Recommendations Structure	47 47 49 50 52
Appendix	-	Some Notes on Making a Submission to	

Digitized by the Internet Archive in 2022 with funding from University of Toronto

# LIST OF MAPS

The maps are bound together following page 53.

Map l	Possible Changes in Muskoka District Boundary
Map 2	Possible Area Municipalities - Alternative 1
Map 3	Possible Area Municipalities - Alternative 2
Map 4	Possible Area Municipalities - Alternative 3
Man 5	Possible Area Municipalities - Alternative 4



# TERMS OF REFERENCE OF THE

#### MUSKOKA DISTRICT LOCAL GOVERNMENT REVIEW

The Review was instituted on May 10, 1967 to enquire into and report upon:

- (a) the structure, organization, financing and methods of operation of all the municipalities and their local boards in the District of Muskoka;
- (b) all aspects of the functions and responsibilities of the existing local government institutions within the said area, and, in particular, without limiting the generality of the foregoing, intermunicipal relations and problems which concern or may concern any two or more of the municipal corporations or local boards having jurisdiction within the said area;
- (c) the anticipated future development of the area or other changes therein which may require reorganization or revision of the existing system of local government in the area;
- (d) the effect of present and anticipated future projects and operations of the national and provincial governments upon the responsibilities and resources of local government therein;
- (e) any other related matters, including an examination of boundaries, affecting the local government structure within the area.



#### INTRODUCTION

The purpose of this report is to present a set of tentative recommendations for the improvement of local government in Muskoka.

The changes suggested are tentative, because the Review is not yet at its final stage, and the Commissioner has not yet had the benefit of receiving submissions at the public hearings. The publication of tentative recommendations at this stage of the Review is a departure from the procedure which has been followed in the other local government reviews. It is hoped that this departure will make the public hearings more meaningful by giving those in the Review area an opportunity to react to the proposals which the Commissioner presently has in mind.

These proposals are based both upon the research findings, as presented in the recently published Research Report, and upon the large number of meetings which have been held in Muskoka in connection with the Review. These meetings represent an extensive dialogue between those in the Review area and the Commissioner, and the publication of these preliminary recommendations together with the reaction to them which may be anticipated at the public hearings, may be viewed as a continuation of this dialogue.

Since these preliminary recommendations are the Commissioner's contribution to this dialogue, and since he bears full responsibility for the opinions expressed, it is deemed appropriate that the first person singular construction be used throughout the remainder of this report. Thus "I" will henceforth be used instead of "the Commissioner".

At this stage of the Review, I have not of course reached any final conclusions regarding the changes which should be made to local government in Muskoka. But on several matters of fundamental importance I have formed firm opinions on the course of action which is required, and unless compelling evidence against these is received at the public hearings, it may be assumed that these firm opinions will become final recommendations in the concluding report of the Review to be issued early next year. Where a preliminary recommendation falls in this category, the fact will be noted by using the phrase "I am of the firm opinion that" such and such a change is required.

On certain other matters, while I have reached an opinion, it is not as firmly held, and consequently these opinions may be changed by less compelling arguments against them. The preliminary recommendations which fall into this category may be identified by the words "I am of the opinion that" such and such a change is necessary.

The remaining preliminary recommendations are made without strong conviction. They may be identified by the phrase "I am inclined to the opinion that" such and such a change is required.

Finally, there are matters on which I have not yet been able to form an opinion. These are dealt with in this report by the presentation of alternative courses of action, which those in the Review area are asked to comment upon.

The various recommendations are presented in four chapters, the first containing those which deal with the structure of local government, the second dealing with representation, the third dealing with boundaries and the fourth with functions and the way they are divided.

This arrangement into chapters will, it is hoped, help make the report both easier to read and to refer to. But it should not be taken to imply that these components can be determined independently, for they are highly interrelated. Nor has this separation been fully adhered to in the report, for it is deemed more logical to treat certain aspects of each component in the other chapters. This interdependence should be borne in mind when considering the recommendations given in each chapter.

A summary list of all the preliminary recommendations is presented in Chapter 6.

#### CHAPTER 1

#### STRUCTURE

Muskoka is presently a Territorial District, and the word District has long been used here to refer to the Muskoka area as a whole. Although the changes which will be proposed would make it unlike the other territorial districts in the province, it seems preferable to continue to use the word District, at least at this stage of the Review, to avoid confusion. Thus, in this report, the word District will be used when referring to matters which pertain to Muskoka as a whole.

# District Government

Having considered the research findings, along with the views I have received from many throughout the Review area, I am firmly of the opinion that an upper tier or District level of government should be established in Muskoka, to be responsible for all matters of District-wide concern. This would require a District council with authority, having powers and responsibilities in an area of jurisdiction comprising the present District of Muskoka, with perhaps some changes to the existing District boundary. The District level of government would be a body corporate which could be referred to as the Corporation of the Municipality of the District of Muskoka.

# Lower Tier Municipalities

It is also my firm opinion that in an area as large as Muskoka, a number of lower tier municipalities are required within the District to deal effectively with those matters which are not of District-wide concern.

It is also possible to consider further dividing this lower tier, thus creating a three level rather than a two level system of government within the District. In this case, the units at the lowest level might be referred to as "local" municipalities, while those at the middle level could be called "area" municipalities.

To avoid confusion the term "local municipality" will be used with this restricted meaning throughout the report, i. e. when referring to the existing local municipalities retained as a third or lowest tier in a three-tier system. The term "area municipality" on the other hand is appropriate for the larger municipal units proposed in the next section, whether these constitute the lower tier in a 2-tier system, or the intermediate tier in a 3-tier system, and will be used with either of these meanings throughout the report.

#### Number of Municipalities

I am firmly of the opinion that for the effective performance of most of those functions which will not be taken over by the District government, it will be essential to have fewer and larger municipalites

than those which presently exist in the District. For some few functions of a very local nature however, such larger units are not urgently required, and this opens the possibility of retaining the present local municipalities as a third or lowest tier in a three tier system.

While at first thought a three-tiered system seems overly complex and cumbersome, particularly for a District with a permanent population of less than 30,000, after lengthy consideration I am inclined to the opinion that the third or lowest tier would really not add greatly to either the complexity or the cost of the system. This is because the purely local functions which would be performed at this level are just the ones which probably would not benefit greatly from operation on a larger scale.

A third tier would complicate the system and add some cost however, and would be justified only if there is a very strong desire to retain the present municipalities.

I am therefore of the opinion that a two-tiered system would be preferable, but that the addition of a third tier would perhaps be a reasonable price to pay for the acceptance of fewer and larger units to provide certain services over wider areas. Thus, only if it proves impossible to replace the existing municipalities with fewer and larger ones, should a third tier be considered. With two tiers or three, the District council would be responsible for the same set of District-wide functions.

One other possibility must be considered, although it is not recommended. That is a two level system with the existing local municipalities comprising the lower level. Because I believe the Research Report has amply demonstrated that most of the present local municipalities lack the resources and staff required to deal effectively with the problems of today and tomorrow, I am of the firm opinion that they should be either replaced by larger units in a two-tier system, or augmented by larger units comprising an intermediate tier. If, however, a two-tier system retaining all the existing municipalities should prove to be the only acceptable compromise, then I am of the opinion that the District government should take over not only the truly District-wide functions, but also some of the most important area functions as well.

#### Method of Election

Much has been said about direct election to a District council, and this method of election does offer four distinct advantages: first, it is clear and simple, and easily understood by the electorate; second, it enables the size of the District council to be determined independently of the number of lower tier municipalities; third, it permits the drawing of electoral areas so as to closely approximate representation according

to population; fourth, it does not require a representative to bear the workload of sitting on two councils.

But direct election has one great drawback, which in my opinion more than outweighs its advantages. This is the fact that it creates an upper tier government which is quite separate from the lower tier government. A horizontal division is thereby created between the two tiers, and unless the lower tier is made subordinate to the upper, there is no way of bridging the gap which may develop between them, for both can claim to be the true representative of the people. Furthermore, I believe this separation tends to breed irresponsible decisions at both levels; District council decisions which ignore their effects on local councils, and vice-versa. It is also certain that the continuous need to "sell" the decisions of each level to the other is made much more difficult by this separation. In short, under a system of direct election, the vital need for continuous coordination of the upper and lower tiers may be impossible to fulfill.

I am therefore firmly of the opinion that indirect election should be used to select the members of the proposed District council, and to select the members of area councils on an intermediate tier if a three-tier system should be established.

Under indirect election in a two-tier system, the heads, and

in some cases the deputy heads of lower tier councils would comprise
the members of the District council; and if a third tier were to be
established, I am of the opinion that the area councils on the intermediate tier should similarly be composed of the heads and in some
cases the deputy heads of the local municipalities or parts of local
municipalities which comprise them. Some possible arrangements
for such intermediate tier representation will be discussed in Chapter 3.

Admittedly, under indirect election the heads and in some cases the deputy heads of local councils would be given an additional workload, particularly in a three-tier system. But the local councils would be relieved of many of their present responsibilities, so that the net increase in workload would not be as great as might at first appear. In addition, under the proposed system, more adequate municipal staffs would be available to take some of the present load off councils. And to compensate for the net increase in workload, I am firmly of the opinion that members of the District council and area councils should receive adequate remuneration for their duties.

# District Council Executive

As will become apparent later in the report, it is likely that the District council would be a fairly large body, and it is clear that it would require an executive of some kind. From observing experience elsewhere with both boards of control and executive committees, I am

firmly of the opinion that an executive committee elected by a council from among its own members is clearly superior, and this form of executive is accordingly the one I would recommend for the proposed District council. The head of the District council should of course also be chairman of the executive committee.

# District Council Chairman

In launching a new system of government, strong leadership is essential, and I am inclined to the opinion that this is more certain to be obtained if the first chairman of the District council is appointed by the Province.

Subsequent chairmen might either be elected at large, or chosen by the District councillors either from among themselves or from among qualified citizens resident in the District; I have not yet formed an opinion on this matter. If the chairman is chosen from the District council members however, one of the lower tier units would in effect lose a representative, and the vacated position should probably be filled by holding a by-election.

#### Boards and Commissions

There are numerous local boards and commissions, and three important joint or District boards now in existence. A fourth joint board, the Lake of Bays Area Planning Board, covers four townships.

With regard to the local boards, I am of the opinion that some would no longer be necessary if the proposed changes in local councils are brought about, and that their responsibilities might better be taken over by the appropriate new council. The others should be changed in accordance with any changes that are made to their respective functions. More will be said about some of these local boards in Chapter 4 which deals with the division of functions.

With regard to the three important District-wide boards, i.e.

The Muskoka-Parry Sound Health Unit Board, the Muskoka District

Children's Aid Society Board, and the Muskoka District Home for the

Aged Board, three main alternatives would be possible once the proposed

new District council were formed:

- independent of any council, the chief difference being that the District council would take over the role now played by local councils in selecting the Health Unit representatives and the four municipal representatives on the Children's Aid Society Executive, and in offering any advice on the appointment of members to the Home for the Aged Board;
- (b) they could be brought partially under District council control by appointing members of the District council

to fill a minority of the positions on each board;

(c) they could be brought entirely under District council control, either by appointing District councillors to fill a majority or all of the positions on each board, or by eliminating the boards and setting up their staffs as departments directly under the District council.

This latter course would either turn each board into a committee of the District council, or eliminate it; and in the case of the Health Unit Board, it would either only apply to the portion of the Board's membership which comes from Muskoka rather than Parry Sound, or it would require splitting the Health Unit into two, one for Muskoka and one for Parry Sound, in order that the Muskoka component might be brought under District council control.

At the present time I am inclined to the opinion that the first of the above alternatives would leave these very important local government functions too remote from the control of elected representatives, while the last, desirable as it might be in the long run, would be a more drastic solution than is actually required at the present time. Accordingly I am presently inclined to favour the second alternative as a means of establishing a continuous and direct relationship between the District council and the District boards, without destroying the independent

dence of the latter. This is however, a subject on which I very much wish to receive local opinion at the public hearings.

Turning now to the Lake of Bays Area Planning Board, it is in some ways a prototype for a part of the planning system which I am presently considering.

Planning is probably the most important task facing the District and accordingly it should be made one of the prime responsibilities of the District council. To achieve this I am firmly of the opinion that a District Planning Board should be established, and that the executive committee of the District council should constitute a majority of its members, with additional citizen members appointed in the usual manner. I am further inclined to the opinion that all professional planning staff in the District should be under this board.

But I also firmly believe that there is a vital need for an area planning function, and would propose that either a planning board or a planning committee of council (perhaps with some co-opted citizen members) be established by each of the proposed area municipalities. In the case of an area planning board, it might be constituted in the usual manner, i.e. with councillors in a minority, or similar to the District planning board, council members might constitute a majority.

boards to the District planning board should be a subordinate one, unlike the relationship of the area councils to the District council, for two reasons: first, the line between matters of District and local concern is almost impossible to draw in the field of planning; and second, in the event of conflict between District and local planning interests, it is considered essential that the District interest should prevail. Thus the District planning board should be given control over all planning decisions made in the District. But it should also be given the power to delegate any responsibilities it wishes to the area planning committees or boards, and it would be expected that most matters of purely area concern would be so delegated.

As the proposed planning system constitutes a most vital part of the governmental structure for the District, and as the proposal I have outlined is no doubt controversial, this is a matter on which I hope to receive extensive local comment at the public hearings.

#### CHAPTER 2

# REPRESENTATION

The matter of indirect versus direct election has been dealt with in the preceding chapter, and actual schemes of representation will be discussed in Chapter 3. In this chapter the other electoral arrangements will be discussed.

#### Basis of Representation

Under the proposed method of indirect election, representation on the District council would be by area municipality. Because the area municipalities would almost certainly have unequal population, representation strictly in accordance with population would probably be impossible. I am of the opinion however, that such representation is a desirable goal, and that it should be approached as closely as possible by giving one or more additional District council seats to the more populous municipalities. I am also of the opinion that some weight should be given to the number of seasonal residents in a municipality when making this determination, a procedure which would in effect give some additional weight to those municipalities having large summer cottage assessments.

# Term of Office

Under the system of indirect election proposed, the term of office of each local or area council must necessarily be made the same as the term

of office for the District council. I am firmly of the opinion that a term of some duration is increasingly required for councils to deal effectively with the complex problems of today. Because of this, I am convinced that a term of office of at least 2 years will be required, and I am inclined to the opinion that a 3 year term would be preferable.

#### Extended Franchise

Some of the existing municipalities have by-laws under the Municipal Franchise Extension Act. I am of the opinion that such by-laws should be brought into effect throughout the District.

#### Dates of Nominations and Elections

Because of the serious budgetary problems which arise when elections are held in the summer, as they presently are in the Villages of Port Sydney and Windermere, I am of the opinion that the more usual dates for nomination and election should apply throughout the District. This would mean that a common date in November should be chosen for the nominations in all municipalities, and a common date in December for the elections. This arrangement would of course not make voting any easier for seasonal residents, and for this problem a solution is offered below.

### Voting by Seasonal Residents

I am of the opinion that a satisfactory procedure can be

developed employing a "mail-in" ballot to make voting easier for seasonal residents. The proposal I have in mind would involve the following steps:

- (a) A seasonal resident desiring to vote by mail at a forthcoming election would be required to register with the Clerk of his municipality at any time during the six months preceding the election date. His or her qualification to vote would be determined at this time, and the appropriate winter mailing address would be entered on a special mailing list compiled by the clerk.
- (b) No special provisions would be made in the nomination procedure, it being assumed that any seasonal residents wishing to take part in nominations would be interested enough to come to Muskoka in November for this purpose.
- (c) Immediately following the nominations, the Clerk would send a printed ballot by registered mail to each seasonal resident who had registered with him. The seasonal residents would have until a stipulated date to inform the Clerk of non-receipt, in which case the registration records would be immediately checked and if the provision of an additional ballot were warranted it would be sent out.
- (d) The voter would be required to return his market ballot, folded so that his mark could not be seen and inserted in a special

- envelope, to be registered and postmarked not later than the time the polls close on the election date.
- (e) After allowing sufficient time for mail delivery, the mailed returns would be opened in the presence of scrutineers. The return envelopes used would bear preprinted identification with the voters list, so that the list could be checked off before opening. The extracted ballots, still folded, would then be thoroughly mixed up in the presence of the scrutineers to assure the secrecy of the ballots, and they would then be unfolded and the votes counted.

I am confident that a procedure along these lines could be developed which would be adequately safeguarded against abuse, and which would make voting significantly easier for seasonal residents without disrupting the election procedure of the municipalities.

#### Remuneration of Councillors

The remuneration presently paid to councillors in the District is quite low, and I am of the opinion that members of the proposed District council and area councils should be paid allowances commensurate with the importance of their duties.

#### CHAPTER 3

# BOUNDARIES

The Review is concerned not only with the boundaries between the municipalities in the District, but also with any changes which may be necessary in the outer boundaries of the District itself. In connection with the outer boundary question, there is a related issue concerning the size of the District as a base for District government operation, which will be dealt with first.

#### Size of a Viable District Unit

The Ontario Committee On Taxation has pointedly raised the issue of the appropriate size for regional government units in Ontario, by proposing a set of regions each of which would be considerably larger than the average southern Ontario county. The Committee's Champlain Region which would contain Muskoka, is similarly much larger than the present District of Muskoka. In the Committee's view, such larger units are essential to provide the population, tax resources and service areas necessary for efficient regional government operation.

The Muskoka District Local Government Review on the other hand, has been given a Review area comprising the present District of Muskoka only, although the terms of reference require an examination of the boundaries. It is thus clear that no such sweeping change as that

envisioned by the Ontario Committee on Taxation was intended by the Province when the Review was established. And pertinent as the Committee's views might be on the subject of size, it is also clear that any move toward significantly larger units should fit into a general pattern adopted by the Government for the province as a whole or at least a large portion of it, and not be undertaken as a result of a single Review which has only examined one area.

Thus, without precluding the possibility of future evolution into or inclusion in such a larger unit, I am of the opinion that the Muskoka Review should confine itself essentially to the task of improving local government within the Review area, including only such outer boundary adjustments as seem necessary to achieve this primary goal. If, after local government in Muskoka has been made more capable of meeting the problems here, it is decided that a larger unit is required, the improved government machinery in the District should be much more capable of assisting in such a further transformation.

#### Outer Boundaries

At the present time, I am of the opinion that there are three main areas where there is some question as to the appropriateness of the present outer boundaries of the District. The areas in question are shown on Map 1, which will be found at the end of the report.

The first of these areas is on the west, comprising the present organized Township of Freeman and the unorganized Townships of Gibson and Baxter, and is really the area comprising the Georgian Bay shoreline and its hinterland within the District. I am of the opinion that Muskoka is oriented mainly to its inland lakes and not to Georgian Bay, and that accordingly, serious consideration should be given to redefining the western boundary of the District of Muskoka so as to place the Georgian Bay shoreline and its hinterland partly under the jurisdiction of Simcoe County to the south, and partly within the District of Parry Sound to the north, both of which have a stronger orientation toward Georgian Bay. I am not of the opinion however that such a change should be considered by itself, because it would have the effect of removing considerable existing and potential assessment from the District, assessment which Muskoka can ill afford to lose in the light of the problems which it faces.

The second and third areas of concern however would suggest boundary adjustments of a compensating nature in terms of assessment, so that the first adjustment might be considered feasible provided the others also took place.

The second area includes the northern portions of Lakes

Joseph and Rosseau and their hinterland, and comprises approximately

the southern two-thirds of the organized Township of Humphry and the south-eastern portion of the unorganized Township of Conger, in the District of Parry Sound. The Village of Rosseau is included in this area. The overriding concern in considering this area is felt to be the need to bring the whole of the Muskoka Lakes under one jurisdiction for the vital purposes of planning and development control.

ation for these first two areas, I am presently inclined to the opinion that most or all of Baxter and Gibson Townships should be made part of the County of Simcoe, that approximately the eastern third of Freeman Township including MacTier should be retained within Muskoka, that the remainder of Freeman should become part of the District of Parry Sound, and that at least the southern two-thirds and possibly the whole of Humphry Township, including the Village of Rosseau, should be made part of the District of Muskoka, along with the eastern or at least the south-eastern section of Conger Township.

As these are significant boundary changes, it is essential that I receive the views of all who might be concerned with them, from both sides of the present boundary, during the public hearings of the Review.

The third area of concern lies to the east of the present District, and includes that part of the unorganized Township of Finlayson

in the District of Nipissing which lies between Muskoka and Algonquin Park. This third area also includes more or less of the united Township of Sherborne, McClintock and Livingstone in the Provisional County of Haliburton. This area seems to be strongly oriented westward to Muskoka, in terms of where the residents go for their schooling, their shopping and their recreation. With regard to the Finlayson portion, I have little doubt that it should be made a part of Muskoka. With regard to the Sherborne, McClintock and Livingstone portion however, the long history of this area as a part of the Provisional County of Haliburton would suggest that rationalization of the boundary might be strongly opposed because of tradition and the County assessment involved. For school purposes however, there is evidently considerable local comern over the fact that the present school arrangements which elementary school pupils to Dorset or Dwight and secondary pupils to Huntsville, will shortly come under the control of the new Haliburton County School Board, which might decide that pupils from this portion of the County should attend schools within the County. In the case of pupils attending the public school which is located at Dorset, this may present no problem; the county-district boundary line runs through the center of Dorset, but the school is located on the Sherborne Township side of the line. But for pupils now going to Dwight or Huntsville, the alternative could mean a considerably longer bus ride than at present.

Thus there seems little doubt that a change in the new school board boundary in this area warrants serious consideration, and the Review would clearly be negligent if it failed to raise the more fundamental issue of the need for a change in the County-District boundary.

Again, it is essential that all who would be concerned with such a change, make known their views to me at the public hearings.

These are the three main areas of outer boundary concern of which I am presently aware. There are in addition however, a few permanent and seasonal settlements located on or adjacent to the existing boundary, the most notable probably being Severn Bridge on the south and Novar on the north. At the present, I am not aware of any strong feeling in these areas that a boundary change is desired; if there are such feelings, it is important that they be brought to my attention at the public hearings.

#### Inner Boundaries

Under the basic proposal that the number of municipalities in the District be reduced and their size increased, the drawing of boundaries for the proposed enlarged municipal units becomes one of the most difficult tasks facing the Review. An almost infinite number of new boundary arrangements is possible, and to devise the most workable and acceptable scheme will require the closest co-operation

between those in the Review area and the Commissioner.

In order to help organize the necessary discussions, some alternative boundary arrangements are presented here. Whether the fewer and larger municipal units proposed are brought about under a two-tiered system (in which case they would comprise the lower tier) or under a three-tiered system (in which case they would form the intermediate tier), it is felt that the same considerations should govern the location of their boundaries. These considerations will therefore be dealt with first, and some additional comments will then be made concerning the ways in which a three-tiered system would differ from a two-tiered system.

There are really only two basic ways of forming the largermunicipal units. The first is by grouping present whole municipalities;
the second is by splitting some or all of the existing municipalities
into appropriate parts, and then regrouping these component parts so
as to form more logical municipal units. Under this second approach
of course, the splitting of existing municipalities could be done very
sparingly, or quite extensively; if taken far enough, most or all of the
present boundaries might disappear.

Four alternative schemes have been prepared as a basis for discussion at the public hearings. These are shown on Maps 2, 3, 4 and 5.

To simplify the presentations, these maps omit the outer boundary changes referred to above.

The first two schemes are based on the grouping of existing whole municipalities, as shown on Maps 2 and 3. It will be noted that the first scheme is very similar to the pattern of electoral districts which has recently been established for the election of members to the new District School Board. The second scheme is quite different in several respects, and results in one less unit than the first. In both these schemes, Bracebridge, Gravenhurst and Muskoka Township have been placed in the same group; this is because without splitting Muskoka Township, it is considered quite unrealistic to place it with either one town or the other. It will also be noted that a third possible alternative based on the principle of not dividing any of the present municipalities, notably a scheme which would leave Bracebridge, Gravenhurst and Huntsville each by itself and confine the groupings to the other municipalities, has not been presented. This is because each of these towns shares significant intermunicipal problems with its neighbouring township or townships, and it is considered essential that the new groupings be such as to largely overcome these problems.

The third and fourth schemes are based on some splitting of existing municipalities and then the regrouping of the resulting parts.

The third scheme involves a minimum of splitting, while the fourth

and involves numerous splits. It will be noted that under the third scheme Bracebridge and Gravenhurst along with the respective adjoining portions of Muskoka Township are placed in separate groupings, while under the fourth scheme, with Bracebridge, Gravenhurst and Huntsville each enlarged, it would be possible to either unite Bracebridge and Gravenhurst, or leave them as separate area municipalities.

If the suggested outer boundary changes were carried out,

Muskoka would lose Baxter, Gibson and part of Freeman, and gain

Humphry, Rosseau, part of Conger, part of Finlayson, and Sherborne,

McClintock and Livingstone, more or less. These changes could be

adapted to any of the above four schemes for area municipalities as

follows:

Humphry, Rosseau, part of Conger and the remaining portion of Freeman could become part of the area municipality comprising Medora and Wood, Port Carling and Bala; and if the resulting area municipality were deemed too large, it might be divided into two;

The part of Finlayson could be attached to Sinclair (both are presently unorganized) and then allocated to one or two area municipalities as shown on the maps;

Sherborne, McClintock and Livingstone could form an additional area municipality on its own; or alternatively it might be split, and one part grouped with Ridout, the other with Franklin, leading to an arrangement of area municipalities for the eastern part of the District different from any shown on the maps.

In any event, it is anticipated that these alternative boundary schemes will provide one of the main topics of discussion at the public hearings. Until I have received extensive local reaction to them, I do not intend to develop any firm opinions as to which is best; it is of course quite possible that as a result of the hearings, an additional alternative not presented here will emerge as the most desirable.

It should be noted however that I am presently inclined to the opinion that the Bracebridge-Gravenhurst area is destined to play a most important role in the future development of the District, and that for this reason a solution which brings them together for area planning purposes and for the planning and administration of at least the more important of the local municipal services, will offer significant long-term advantages not only to the two towns themselves but also to the District as a whole.

Three further matters deserve comment. The first concerns the presently unorganized townships which are now in the District or

would be in the District under the suggested outer boundary revisions.

In each case I am firmly of the opinion that these territories should

be brought under municipal organization by attaching them to an adjacent organized municipality, thereby forming a larger municipal unit.

The second concerns any organized municipalities which might be brought into the District through changes in the outer boundary. I believe they should be treated in the same was as the organized municipalities now in the District; that is they should retain their identity under a three-tier system, or lose it by becoming part of a larger unit under a two-tier system. The Township of Sherborne, McClintock and Livingstone could be an exception under a two-tier system however, as it might be considered large enough to constitute an area municipality by itself.

The third concerns the size of the proposed area municipa ities, and the fact that some of the municipal services they would be
made responsible for would not be provided throughout their whole area
of jurisdiction, or would be provided with different standards of service
to different parts of each area. I am firmly of the opinion that local
service areas should be established under these conditions to assure that
the costs of each municipal service are equitably borne by the taxpayers
in accordance with the service benefits which they may receive. In this
way, the threat of higher taxes without a commensurate improvement

in services, which some might fear on inclusion in a larger unit, should be largely averted.

### Representation with Two Tiers

If a two-tiered system is adopted, with fewer and larger municipalities comprising the lower tier, each new area municipality might have either a five or a seven man council, and wards might be established which would correspond either exactly or generally to the areas taken over from each of the existing municipalities.

The number of representatives which each area municipality should have on the District council would then be determined roughly in accordance with population, giving some weight to seasonal population. This could be done so as to give some municipalities one representative, some two, and some three, and with these numbers, the size of the District council might perhaps be kept to between nine and fifteen members. Where a municipality was given two or three representatives on the District council, it would be appropriate that the second and third representatives be deputy mayors or reeves, elected at large within the municipality.

The municipal councils could of course be made larger than five or seven members, at least for those municipalities given two or three representatives on the District council. And the District council

could also be made larger, with the number of representatives from the various municipalities perhaps ranging from one or two up to five or six.

# Representation with Three Tiers

If in addition to the area municipalities, the existing local municipalities were retained as a third or lowest tier, it would be essential that each of the present municipalities be represented on the council of the area municipality of which it was a part; and I am also of the opinion that each should be represented on the District council. To accomplish this, it would probably be necessary to have all the members of each area council sit also as members of the District council.

To approximate representation according to population, some of the existing municipalities would have to be given two or perhaps three representatives, and it is assumed that each would sit on both the area and District councils.

Under the third and fourth boundary schemes, where some of the existing local municipalities would be split between two or more of the area municipalities, there could be representation on each of the area councils involved. For example under the third scheme (Map 4), Muskoka Township could have a representative on the council of the area municipality comprising Bracebridge, Monck, Macaulay and part of Muskoka Twp., and another representative on the council of the area

municipality comprising Gravenhurst, Morrison and the rest of Muskoka

Twp.; and both Muskoka Township representatives would of course also

sit on the District council.

With three-tiers, a fairly large District council of between perhaps twenty-five and thirty-five members, would of course be required in order to give each existing local municipality at least one District council representative, and to allow representation roughly in accordance with the population.

An alternative system of representation with three-tiers, involving direct election of the area councils, with the heads and in some cases the deputy heads of the area councils then comprising the District council (indirect election to the District council), would also be possible. I am however, inclined to the opinion that the arguments in favour of indirect election for two-tiers are just as compelling for three. Indeed, only if the same persons sit on both the local and area councils, is a rational division of responsibilities between them likely to be worked out. And over time, if it proves advantageous to have the area municipality perform more functions on behalf of its local municipalities, an evolution would be possible which could conclude with the local municipalities agreeing to hand over all their responsibilities to the area council, in which case the third tier would in effect, be eliminated. I am of the opinion that such an evolution would be much more likely with

indirect election to the area councils; for one person playing two roles is much more likely to agree to the reduction or elimination of one of the roles.

### CHAPTER 4

### FUNCTIONS

The division of functions between the upper and lower tiers is a vital aspect of the kind of solution that is being considered. If a two or three tiered system is to work well, it is essential that each tier be given those functions which it can best perform. And since conditions are continually changing, I am of the opinion that provision should be made for adjusting the division of functions without great difficulty.

The most important division of course is that between the District council on the one hand, and the lower tier or tiers on the other, and I am of the opinion that this division should be the same in either the two or three tiered system that is being considered. In other words, if a third tier were added in order to retain the present local municipalities, it would simply be given some of the functions from what would then be the intermediate tier of area municipalities, and the division of functions between the District council on the one hand and these two lower tiers on the other would be the same as in a two-tiered system.

The major concern therefore is with the functions which are to be given to the District council. I am of the opinion that once these have been decided they should be stipulated in the legislation required to

by the Minister of Municipal Affairs (without the requirement of a legislative amendment) acting either on request from the District council, or on his own initiative.

If a three-tiered system were established, I am of the opinion that the initial division of functions between the lowest and the intermediate tier should again be stipulated by the legislation, and that subsequent changes might be made either by the Minister of Municipal Affairs, or by a two-thirds vote of the area council concerned, without the requirement of a legislative amendment in either case.

The aim of these provisions is to protect the interests of each tier and at the same time to make it easy for the system to evolve and adapt to changing conditions, as the representatives gain experience and develop broader attitudes.

#### Division of Functions

The accompanying table sets out a possible division of functions as a basis for further discussion at the public hearings, and shows the additional breakdown that would be required if a third tier were established in order to retain the existing local municipalities.

Where the table shows a function allocated entirely to one tier, no further explanation is necessary in most cases, but where a function

# SUGGESTED DIVISION OF FUNCTIONS

	Lower Tier in a 2-Tier System  Area Councils		Upper
Function			
	Lowest Tier in a 3-Tier System	Intermediate Tier in a 3-Tier System	
	Local Councils	Area Councils	District Council
assessment			X
building and plumbing inspection		X	
capital borrowing			X
cemeteries, museums, etc.	X		
clerk-treasurer functions	X	х	X
conservation			X
economic development			X
emergency ambulance service			X
fire protection		X	X
garbage collection	X		
garbage disposal		X	
health			X
hospital facilities planning			X
libraries		X	X
parks	х		
planning		X	X
police protection *	X		
purchasing		X	Х
recreation	X		
roads		X	X
sewage disposal		X	
tax billing			Х
water supply		X	
electricity supply **		x	
welfare - general			X <sub>.</sub>
- child			X
- aged			X

<sup>\*</sup> only where a municipal police department now exists

<sup>\*\*</sup> only where a municipal hydro system now exists

is shown as shared between two levels some comment is required.

These shared functions along with a few of the unshared ones, are discussed below.

### Fire Protection

It is considered that the primary responsibility for this function should lie with the councils of the area municipalities, but it is thought that the District council might play a useful role in setting up an improved communication system, in the purchasing of equipment, in establishing training programs, and in fire prevention and public information programs.

### Libraries

Again, it is considered appropriate that the existing libraries should be taken over by the area municipalities, probably by establishing a library board in each of the four area municipalities which would be involved. It is not certain that there would be an appropriate District role here, but it seems likely that central book purchasing, cataloguing, and inter-library loan facilities could both improve the service and cut costs. Similarly, a centralized pool of reference books could be established. Whether such central services could be provided better by the proposed District council or by the Algonquin Regional Library, or perhaps through the cooperation of both, is not clear. The views of library officials on this matter would

be welcome at the public hearings.

# Planning

An outline of the type of planning system which is under consideration has been given in Chapter 1. It should be noted again here that this proposal would place the primary responsibility for planning with a District planning board, but with an important advisory role for the area planning committees or boards to be established in each area municipality, and with the District board being permitted to delegate such responsibilities as it wishes to each area. It is also suggested that all professional planning staff should be employed by the District board which would make staff service available to the area municipalities as necessary; under the District board's power of delegation, one or more staff members could be more or less permanently assigned to serve an area municipality.

### Roads

The possible need for a District road system was discussed at some length in the Research Report, and it is expected that this issue may be one of the more controversial matters to be discussed at the public hearings. I am presently inclined to the opinion that a District road system should be established and placed under the jurisdiction of the District council, but that the thorny question of

whether the District should take over responsibility for any of the provincial secondary highways might be left for negotiation between the District council and the Department of Highways.

# Economic Development

The importance of both tourism and industrial development to the future economy of Muskoka has been discussed in the Research Report. While it is felt that they are not necessarily incompatible, it seems clear that further industrial development will have to be carefully planned to prevent undesirable effects on Muskoka's tourist potential. For this reason, and also to provide a single channel for communication between local government in the District and the Muskoka Tourist Association, I am of the opinion that both these aspects of economic development, insofar as they are matters of municipal concern, should be made responsibilities of the District council. This should enable more effective promotional campaigns to be undertaken, and should largely replace inter-municipal competition for assessment by a concerted District effort to develop the economy for the benefit of Muskoka as a whole.

# Clerk-Treasurer Functions

These are indicated in each column of the table, because any municipal corporation has matters of this nature which must be continually attended to. It is possible however, that if a third tier

were added, at least some of the existing local municipalities would find it to their advantage to pool their resources and share a full-time clerk-treasurer; if this were to happen it might be logical to go one step further, and have the clerk-treasurer's department of the area municipality involved perform these functions for each of its constituent local municipalities.

# Purchasing

This function is indicated in two columns of the table, because while it may be convenient for each area municipality to do at least some of its own purchasing, there would almost certainly be significant savings if the District council were to undertake bulk purchasing of certain items for all the area municipalities. Similarly, if a third tier were established, it would seem feasible for each area municipality to do the purchasing on behalf of its constituent local municipalities.

# Sewage Disposal, Water Supply and Electricity Supply

These functions are indicated only in the "area municipalities" column of the table, but require some additional comment.

While it is felt that there should probably be no District role in the provision of these services, it is assumed that the District council through its control over planning, would have to approve of any extensions to the sewer, water and hydro systems involved.

With regard to public utilities commissions, it is suggested that where these presently exist they should be taken over by the area municipality involved, but that the P.U.C. service area in each case should be restricted to that portion of the area municipality which is in fact being served at any given time, following the local service area principle which was discussed in Chapter 3.

### General Welfare Assistance

Again, this is a function shown in the table as entirely a responsibility of the District government, but some further comment is called for. At the present time, general welfare assistance is a responsibility of the existing local municipalities. Present provincial legislation would require the establishment of a District Welfare Administration Board if a majority of the municipalities in the District passed by-laws authorizing it, but this has not yet happened in Muskoka. If general welfare assistance is made a District responsibility however, the question is raised as to whether it should be administered by a new board created for the purpose, or directly by the District council.

In Chapter 1, I have indicated that I am presently inclined to the view that the existing District boards might be retained, with District councillors added so as to represent a minority of each

board's membership and ensure continuing liason between the boards and the District council. I am of the opinion however, that with the establishment of a District council, no further District boards should be established aside from the proposed District planning board. Accordingly it is my firm opinion that general welfare assistance should be made a direct responsibility of the proposed District council.

This need not obstruct a desirable increase in the coordination of the three welfare services (child welfare, the home for the aged, and general welfare assistance), both among themselves, and with the related field of health. With District councillors sitting as members of the existing District boards, it should be possible to work out any desirable arrangements for the pooling of staff and the sharing of quarters and other facilities. If, on further examination, it should become apparent that obstacles would be placed in the way of such coordination by having three services under boards and a fourth under the District council, then I believe the proposal to leave the existing District boards in existence would have to be reconsidered.

# Ambulance Service

This function is also indicated as entirely a District council responsibility in the table, but again a word of explanation is in order.

The Province in 1966 accepted the responsibility of supporting local

ambulance services, and provincial control of the standard of service was extended in 1967. To be eligible for subsidy, private operators of ambulances must now be licenced and operate a 24 hour service with properly trained personnel. The responsibility that is here proposed for the District council, would therefore amount only to ensuring that adequate ambulance services are made available throughout the District with the help of the provincial subsidy.

### Conservation

As indicated in the Research Report, it is apparent that the conservation of Muskoka's natural assets must necessarily be one of the major concerns of the District in the future. Although the present Conservation Authorities Act does not seem well-tailored to the particular conservation requirements of an area like Muskoka, it would appear that the District will need any provincial assistance which may be made available if it is to mount an effective conservation program. In the Research Report, some doubt was expressed as to whether the establishment of a conservation authority or authorities for the watersheds in Muskoka would be warranted. On principle, I would in any event be inclined to oppose the creation of any additional special purpose bodies. But because two of the watersheds in question extend well beyond the Muskoka District boundaries,

the establishment of one or more conservation authorities covering the District along with other areas, may prove desirable in the future.

What is proposed here than, is that the field of conservation be made a responsibility of the District council rather than the area councils. The District council may then decide the best way of mounting an effective conservation program for the District.

It is hoped that the above comments will help to clarify my present views with regard to the division of functions. It should be stressed again that this is a most important aspect of any system of local government, and one which must be geared to the capabilities of the municipal units involved. The division of functions should therefore be considered in the light of the alternatives for a two-tiered or three-tiered system, and of the alternative boundary schemes for the area municipalities.

### CHAPTER 5

# CONCLUSION

In this report I have attempted to set out my present opinions as clearly and fully as possible, in order that anyone in the Review area may have a full opportunity at the forthcoming public hearings to argue with me and point out where I am wrong.

In a sense therefore, this report is a challenge to the Review area to react to the positions I have hereby taken, and to inform me where there is agreement and disagreement. Only if I receive all significant local opinion on these matters at the public hearings will I be in a position to give full and proper consideration to the views of the people in Muskoka when I draft the final report and recommendations early next year.

Those intending to make submissions at the hearings are referred to the "Notes on Making a Submission To The Review" which were included in the Research Report, and which are reprinted again, with necessary modifications, as an appendix to this report.

It is hoped that the fall meeting of the present Muskoka

District Council may be scheduled this year for late October, and
that it will be devoted largely to the Review, so as to provide a full
opportunity for the asking and answering of any questions concerning

submissions, the public hearings, or any aspect of the Review procedure. If sufficient time is available at the meeting, it is intended to organize workshop sessions on several of the tentative recommendations which have been presented in this report, in order to permit a frank exchange of opinions among representatives from all parts of the Review area. In this way, it is hoped that the M.D.C. meeting may help prepare the way for the public hearings scheduled for the latter half of November.

### CHAPTER 6

# SUMMARY OF PRELIMINARY RECOMMENDATIONS

### STRUCTURE

- (1) That an upper tier or District government be established in Muskoka.
- (2) That a lower tier be established, comprising area municipalities fewer in number and larger in size than the existing local municipalities.
- (3) That if it proves necessary to retain the existing local municipalities, this be done by placing them on a third or lowest tier, responsible for functions of a purely local nature.
- or a three-tiered system is adopted: with three tiers, all the members of each area council (on the intermediate tier) would also sit as members of the District council.
- (5) That the District council have an executive committee
  to be elected by the District council members from
  among themselves, with the chairman of the District

council also serving as chairman of the executive committee.

- (6) That the first chairman of the District council be appointed by the Province, and that subsequent chairmen either be elected at large or chosen by the District councillors, either from among themselves or from among qualified citizens resident in the District; if the chairman is chosen from the District council members, the municipality which thereby "loses" its representative would fill the position by holding a by-election.
- (7) That existing local boards be altered as necessary to conform with the division of functions which is adopted.
- (8) That the three existing district-wide boards be retained, with the appointment of District councillors to form a minority of the membership of each board.
- (9) That a District planning board be established with the executive committee of the District council comprising the majority of its membership and appointed citizen members making up the remainder.

- of council (perhaps with some co-opted citizen members) be established in each area municipality, and that in the case of a board, the area councillors be permitted to comprise either a minority or a majority of the board's membership.
- (11) That the area planning boards be subordinate to the District planning board, but that the District board be given the power to delegate any responsibilities that it wishes to the area boards.

### REPRESENTATION

- (12) That representation on the District council, and on the area councils if the existing local municipalities are retained as a third tier, be by municipality, but with the number of representatives from each municipality determined so as to approach representation according to population, with seasonal residents given some weight in determining the numbers.
- (13) That the term of office of all councils in the District be at least two years and possibly three years.

- (14) That the extended franchise be adopted throughout the District.
- (15) That a common date in November be chosen for the nominations in all municipalities, and a common date in December for the elections.
- (16) That a "mail-in" ballot procedure be adopted throughout the District to facilitate voting by seasonal residents.
- (17) That members of the District council and of the area councils be given remuneration commensurate with their responsibilities.

# BOUNDARIES

of the unorganized townships of Baxter and Gibson from the District of Muskoka and attaching them to the County of Simcoe, and to removing approximately the western two-thirds of the organized Township of Freeman from the District of Muskoka and attaching it to the District of Parry Sound; provided that at least the southern two-thirds and possibly the whole of Humphry Township, including the Village of

Rousseau, along with the south-eastern or eastern portion of the Township of Conger, be brought into the District of Muskoka; and provided that the portion of Finlayson Township lying between the present Muskoka District boundary and Algonquin Park, and more or less of the united Township of Sherborne, McClintock and Livingstone, be brought into the District of Muskoka. See Map 1.

- (19) That consideration be given to four alternative schemes for determining the boundaries of the proposed area municipalities, as shown on Maps 2, 3, 4 and 5.
- (20) That all unorganized territories remaining in or brought into the District of Muskoka be organized, but that in each case they be attached to an existing organized municipality so as to form a larger municipal unit, rather than giving them councils of their own.
- (21) That any organized municipalities brought into the

  District through changes to the outer boundary, be

  treated in the same manner as the organized municipalities now in the District when establishing the proposed area municipalities.

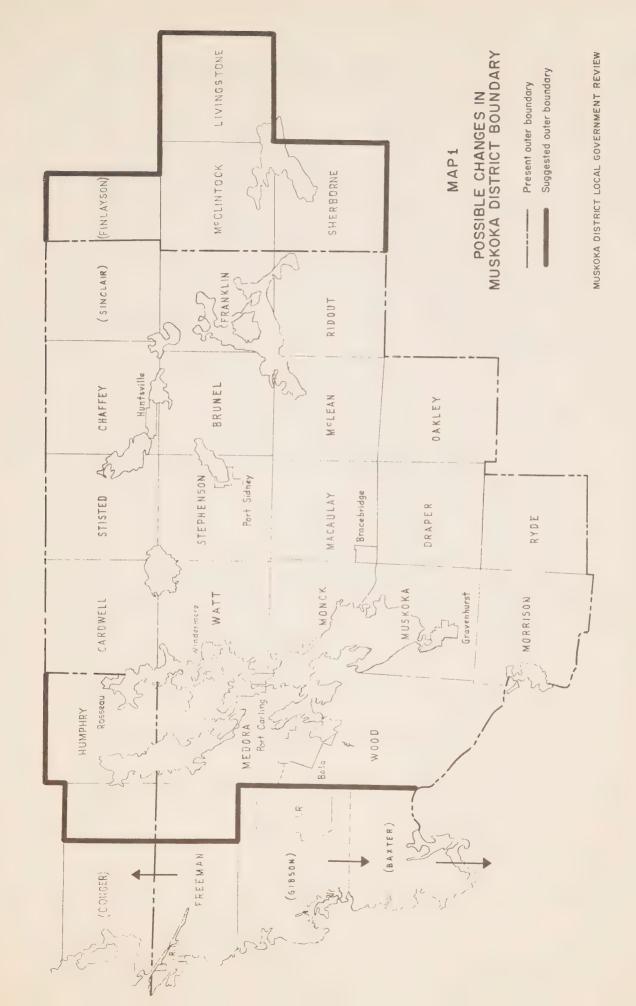
(22) That local service areas be established within each area municipality as required to assure that the costs of services which are provided to a part of the municipality are not borne by those who do not benefit from them.

### **FUNCTIONS**

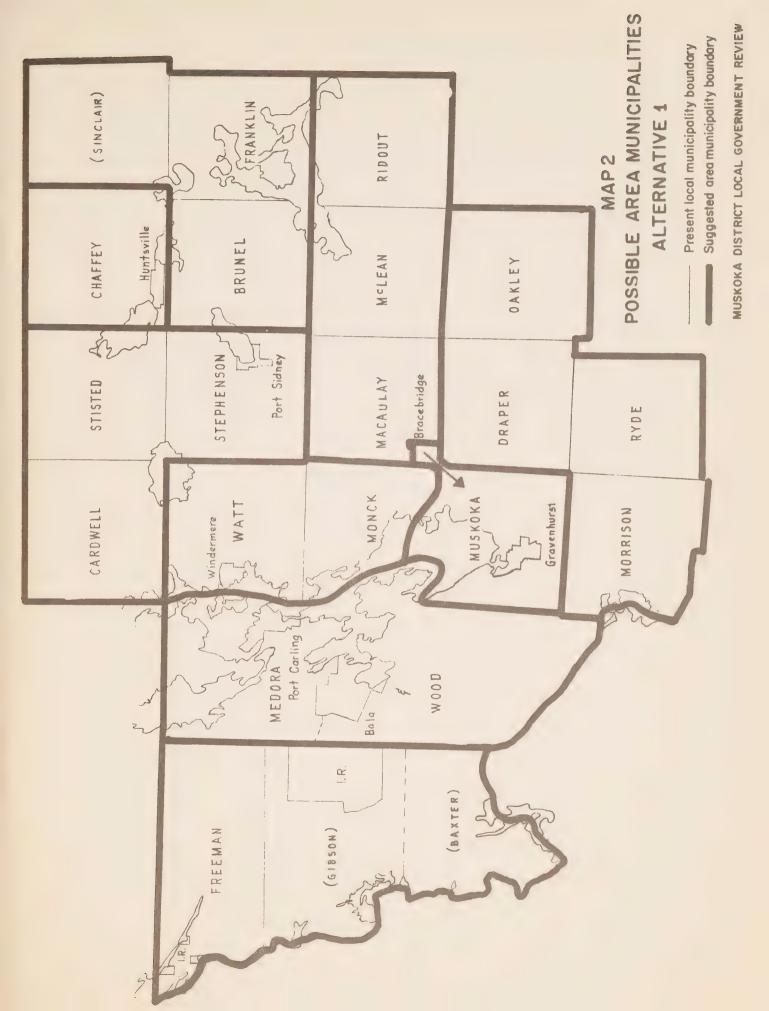
- (23) That the division of functions be determined initially by legislation, but that subsequent changes in the functions allotted to the District council may be made by the Minister of Municipal Affairs, without the requirement of a legislative amendment.
- (24) That if a three-tiered system is established, the division of functions between the intermediate and the lowest tier be initially established by legislation, but that subsequent changes between an area municipality and its constituent local municipalities may be made either by the Minister of Municipal Affairs, or by a two-thirds vote of the area council, without the requirement of a legislative amendment in either case.
- (25) That the proposed division of functions set out in the

table on page 36 be considered in the light of the alternatives for a two-tiered or three-tiered system, and of the alternative boundary schemes for the area municipalities.

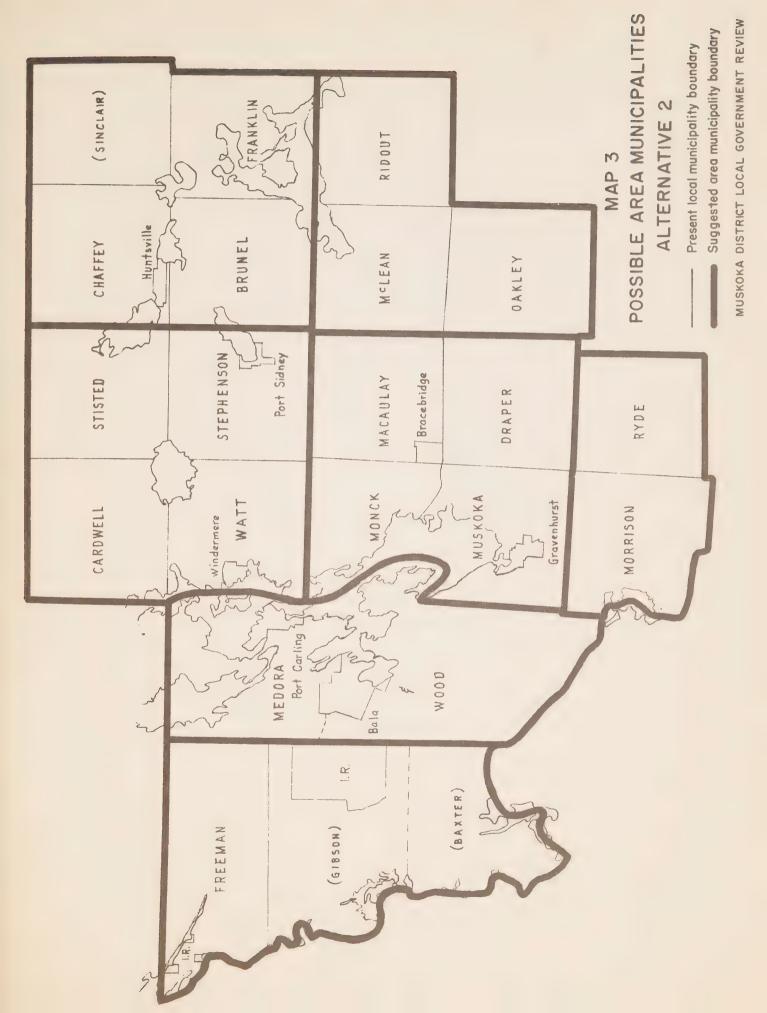




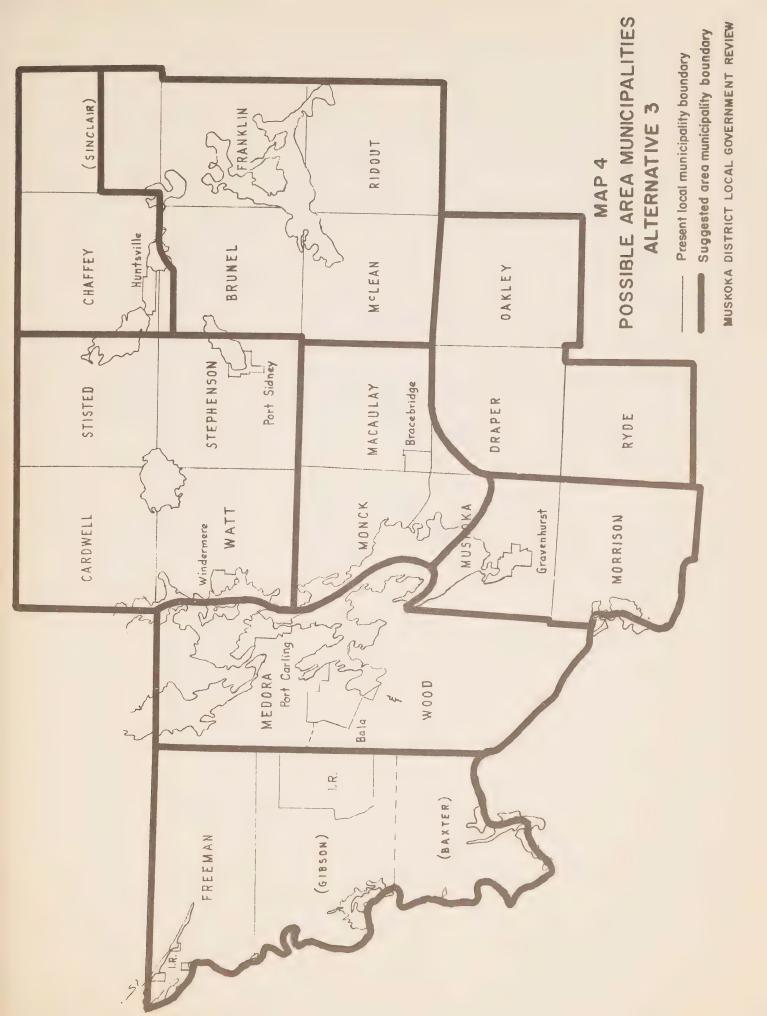
















## APPENDIX

## Some Notes on Making a Submission to The Review

It is intended to hold the public hearings for the Review during the latter half of November, 1968. The exact times and places will be advertised later.

It is the desire of the Commissioner to receive the views of all who are concerned with the future of local government in Muskoka, to guide him in making his final recommendations. It is therefore intended to make it as easy as possible for those having opinions to submit them at the hearings.

Submissions of three kinds will be acceptable from local authorities, organizations and individuals: a written brief accompanied by personal discussion at the hearings; a written brief alone, without personal appearance at the hearings; and an oral submission presented at the hearings, unaccompanied by any written brief. Those submitting a written brief and also appearing at the hearings, will not be expected to read their brief during the hearing (the Commissioner will already have read it), but rather to discuss it with the Commissioner, so that he will fully understand the position taken. The hearings will be kept as informal as possible, to permit free and frank discussion of the points at issue.

It is hoped that most of the submissions will comprise a written brief accompanied by discussion at the hearings, for in this way the Commissioner will be given the best opportunity of gaining a full under-

standing and appreciation of the submission.

As to the form of a written brief, this is of much less importance than the content. Other things being equal, a brief that is well organized and presentable in appearance will be preferred of course. But a well-thought-out brief written on a few pieces of paper will be given more weight than a thick, handsomely-printed document which shows little serious thinking on the subject.

What is important is that the submissions come to grips with the essential issues facing local government in Muskoka. The Statement of Alternatives previously issued by the Review, and the subsequent questionnaire and workshop discussions on the alternatives should be considered, along with the Research Report, and these Preliminary Recommendations.

The Preliminary Recommendations outline the main changes in the structure and functions of local government in the Review area which the Commissioner, at this time, is convinced are essential. Unless compelling arguments against these main changes are received in the submissions, they will form the basis for the Commissioner's final recommendations to be made early next year. Those making submissions will therefore have an opportunity at the public hearings in November to react to the main changes which are proposed in this report. It is hoped that the submissions

and the discussions at the public hearings will indicate clearly how acceptable these tentative recommendations are. If they are generally acceptable, the submissions and discussions should then be able to concentrate on all the details of structure, organization and function which have not been dealt with. In this way, local authorities, organizations and individuals throughout the Review area will be able to express their opinions on and thereby influence not only the main changes, but also the many detailed changes which the Commissioner will recommend in his Final Report.

Those intending to make submissions should as soon as possible inform the Review Office at Box 1229, Gravenhurst, phone 687-3331. In order to schedule the hearing times, it will be necessary that those wishing to appear make their intentions known to the Review no later than October 31st, 1968.

Written briefs should preferably be submitted in six copies, but a single copy will be acceptable. The Review cannot however, undertake to make additional copies available for further distribution. Any requests from the press or others for additional copies will therefore be referred to the authors. If a written brief is submitted, it will be assumed that the author will be prepared to appear at the public hearings and discuss it, unless exclusion from the hearings is specifically requested. Briefs to be accompanied by such an appearance at the hearings should be received no later than November 8th, 1968, in order

that the Commissioner may have an opportunity to read them all before the hearings commence. Other briefs will be received up to the end of November.

Following the hearings, copies of all the briefs received will be displayed in the Review Area so that anyone wishing to come and examine them will be able to do so. Additional statements of elaboration or rebuttal will be received up to the end of December from any local authority, organization or individual having made a submission.

Finally, the vital role of submissions in the Review process must be re-emphasized. If the Review is to result in sound recommendations which can be readily implemented, it is essential that the Commissioner be made fully aware of opinion throughout the Review Area, before he drafts his final recommendations. This can only be accomplished if all those with opinions on the subject make submissions.



